UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3188

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

JUN 06 2019

Reply to: 20-C04

Mr. Pete Doornenbal
Doornenbal Dairy
13146 Galloway Road
Caldwell, Idaho 83607

Re: Clean Water Act Compliance Evaluation Inspection at P&L Doornenbal Dairy located at 13146 Galloway Road in Caldwell, Idaho.

Dear Mr. Doornenbal:

On April 3, 2019, the PG Environmental, on behalf of the United States Environmental Protection Agency (EPA), conducted a compliance inspection at your facility. The purpose of the inspection was to determine compliance with the Clean Water Act (CWA). A copy of the inspection report is attached to this letter. Please review the inspection report, note the areas of concern, if any, and take any actions necessary to ensure compliance with the CWA.

An EPA Compliance Officer will use this inspection report in evaluating your facility's compliance with the CWA. This may result in subsequent contact from EPA personnel if a violation is identified. This letter is sent only to transmit the inspection report, and it should not be interpreted as a final compliance determination. Please direct any questions regarding compliance evaluations to Steven Potokar at (206)-553-6354 or potokar.steven@epa.gov.

Thank you for the cooperation and assistance extended to the PG Environmental staff during the inspection.

Sincerely,

Jeff KenKnight

Jeff KenKnight, Chief
Surface Water Enforcement Section

Enclosure

cc: Mr. Mitch Vermeer
Idaho State Department of Agriculture

IDAHO CAFO INSPECTION REPORT

GENERAL INFORMATION

Facility ID #: N/A* – unpermitted CAFO **Facility Name:** P&L Doornenbal Dairy **Facility Owner:** Pete Doornenbal **Facility Operator:** Pete Doornenbal **Mailing Address:** 13146 Galloway Rd. Caldwell, ID 83607 **Physical Address:** 13146 Galloway Rd. Caldwell, ID 83607 **County:** Canyon **Contact Person:** Pete Doornenbal **Phone *(office)*:** 208-577-7535 ***(fax)*:** N/R* ***(cell)*:** N/R **E-mail:** N/R **Persons Present During Inspection:** Pete Doornenbal (P & L Doornenbal Dairy); Rick Naerebout, Tanya Oldham, and Megan Satterwhite (Idaho Dairymen's Association); Emily Montague and Pradip Adhikari (Idaho State Department of Agriculture [ISDA]); Nicole Deinarowicz and Sarah Hansen (Idaho Department of Environmental Quality); Sirese Jacobson and Jennifer Ferrando (PG Environmental)	**Inspectors:** Sirese Jacobson and Jennifer Ferrando (PG Environmental) **Inspection Date:** April 3, 2019 **Time In:** 8:05 AM **Time Out:** 10:05 AM **Weather:** Overcast, approx. 45° F. **GPS Reading (At Gate)** **North:** 43.75030 **West:** -116.65443 **Does the facility owner/operator own and/or operate any other animal feeding operations?** Yes; Mr. Doornenbal owns a heifer ranch in Idaho. **If yes provide name(s) and address(es) and indicate whether the facility is an AFO or a CAFO:** N/R
Max. Animals Confined per Month: ~850 **Max. Capacity of Facility:** ~900	**Location and name of nearest surface water[1] and description of flow path:** Doornenbal Dairy is approximately 3.5 miles north of the Boise River. East Hartley Gulch, which drains to the Boise River, is approximately 0.6 miles east of the dairy.

Number of animals today (all animals in production area):

	# confined		# confined
Cattle		**Sheep**	
Dairy mature	900 milking, 30 dry	**Dairy heifers**	
Swine (≥55#)		**Swine (<55#)**	
Turkeys		**Laying hens**	
Other chickens		**Other (specify)**	4 calves

X	**Presented credentials? (check if yes)** Presented Letter of Authorization dated March 26, 2019
X	**Inspection photos or aerial photo/site map attached? (check if yes)**
X	**Potential compliance issues? (check if yes and summarize below)**

*NA = Not Applicable; NR – Not Requested

Note: the federal regulations cited throughout the checklist are included as reference for discharging CAFOs.

[1] Surface water means all waters of the United States.

SUMMARY OF POTENTIAL COMPLIANCE ISSUES

- The facility representative could not locate a copy of the approved NMP at the time of the inspection. However, the facility provided an unapproved NMP for review, which had been recently developed by the facility owner, a certified nutrient management planner. It is recommended that the facility maintain a copy of the current, approved NMP onsite and submit the new NMP to ISDA for review and approval.
- During the site tour, the inspectors observed that minimal freeboard (2-3 inches) was available in the northwest corner of the Northwest Evaporation Pond (Photograph 1). An overflow of wastewater from this location would flow into the adjacent field. It is recommended that the facility pump down the lagoon to maintain at least two feet of freeboard.
- According to the facility representative, the facility had an overflow of approximately 1,000 gallons from the Concrete West Slurry Pit approximately two weeks before the inspection. The inspectors observed that the overflow entered an adjacent field which is owned by Doornenbal Dairy and leased to a third party (Photograph 2). The facility representative did not notify ISDA of the overflow and did not have records onsite documenting the overflow. It is recommended that the facility notify ISDA and maintain documentation onsite of any overflows in the future.
- During the site tour, the inspectors observed a small quantity of spilled slurry on the facility lane that accesses the Concrete West Slurry Pit; it appeared that runoff from this area would flow into the adjacent field. According to the facility representative, when slurry was pumped out of the Concrete West Slurry Pit to stop the overflow, the truck driver may have emptied the hose onto the ground instead of back into the slurry pit. It is recommended that the facility representative educate the truck drivers on appropriate procedures when pumping wastewater from its impoundments to prevent discharging wastewater offsite.
- According to the facility representative and based on site observation, runoff from the silage storage area and the southern portion of the southeast pens flow to a low spot near Emmett Road. The facility can pump wastewater from this area into the East Liquid Lagoon. It is recommended that the facility ensure that wastewater is not stored in this area or is pumped to a designated impoundment to prevent wastewater from exiting the property.
- During the site tour, the inspectors observed waste silage in an area that would drain to the borrow ditch along Emmet Road. In addition, the inspectors observed silage (i.e. pieces of cornstalks) in the borrow ditch at the southeast corner of the property. The inspectors were unable to establish a connection to Waters of the U.S. from the borrow ditch. However, it is recommended that the facility maintain the silage storage area to prevent runoff and silage from entering this ditch.

INSPECTION OBSERVATIONS

Nutrient Management Plan (NMP)

Required NMP Element [40 CFR 122.42(e)(1)]

Indicate whether the following elements are included in the NMP:

No 1. Is the facility's NMP available on-site? Does it reflect the current operational characteristics and practices? [40 CFR 122.42(e)(2)(ii)]

Date developed or last revised: A copy of the most recent ISDA-approved plan, dated January 24, 2014, was not available on site. The NMP available at the facility was developed by Pete Doornenbal, who is certified by ISDA to develop NMPs, using the current version of ISDA's NMP software. That NMP, dated March 26, 2019, had not been submitted to ISDA for review and approval. All statements about the NMP in this report refer to the unapproved 2019 version of the NMP, unless otherwise specified.

Yes 2. Ensure adequate storage of manure and process wastewater, including operation and maintenance procedures. [40 CFR 122.42(e)(1)(i)]
The NMP identifies individual storage structures and capacities. Data provided in the unapproved 2019 NMP indicates that the facility has approximately 2.5 times more wastewater storage capacity than required. The approved (2014) NMP, based on information provided by ISDA, indicates that the facility has approximately 4.5 times more wastewater storage capacity than required. The approved (2014) NMP did not include two ponds that are included in the 2019 NMP. Observations during the inspection suggest that the facility has insufficient wastewater storage capacity. This NMP element is not required for unpermitted CAFOs under the Clean Water Act.

No 3. Ensure proper management of animal mortalities. [40 CFR 122.42(e)(1)(ii)]
The facility's NMP does not address animal mortality management. This NMP element is not required for unpermitted CAFOs under the Clean Water Act.

N/A 4. Ensure that clean water is diverted, as appropriate, from the production area. [40 CFR 122.42(e)(1)(iii)]
Based on information provided by the facility representative and site observations, localized topography generally would prevent run-on to the production area. It was not clear whether run-on could enter the facility from the at the access point to Emmett Road and collect in the ponding area along Emmett Road. It is recommended that the facility operator evaluate that area and if necessary implement measures to prevent run-on to the site from Emmett Road. This NMP element is not required for unpermitted CAFOs under the Clean Water Act.

N/A 5. Prevent direct contact of confined animals with surface waters. [40 CFR 122.42(e)(1)(iv)]
Surface waters do not flow through any portion of the production area. This NMP element is not required for unpermitted CAFOs under the Clean Water Act.

No 6. Ensure proper disposal of chemicals and other contaminants. [40 CFR 122.42(e)(1)(v)]
The facility does not use pesticides. Chemicals are used for milk tank cleaning and the facility maintains a 900-gallon aboveground fuel tank. According to Mr. Doornenbal, all chemicals necessary for use in the operation are fully used, creating no waste chemicals for disposal. Empty chemical containers are returned to the supplier. This NMP element is not required for unpermitted CAFOs under the Clean Water Act.

Nutrient Management Plan (NMP) (continued)

NOTE: Unpermitted CAFOs with agricultural stormwater runoff are required to implement the following nutrient management planning elements (7 – 10) to qualify for the agricultural stormwater exemption [40 CFR 122.23(e)]

N/A 7. Identify site-specific conservation practices to control runoff of pollutants. [40 CFR 122.42(e)(1)(vi)]
No manure or wastewater is land-applied to fields under the operational control of Doornenbal Dairy.

N/A 8. Identify protocols for manure, process wastewater, and soil sampling and testing. [40 CFR 122.42(e)(1)(vii)]
No manure or wastewater is land-applied to fields under the operational control of Doornenbal Dairy.

N/A 9. Establish protocols to land apply manure or process wastewater in accordance with site-specific nutrient management practices that ensure appropriate agricultural utilization of the nutrients in the manure, litter, or process wastewater. [40 CFR 122.42(e)(1)(viii)]
No manure or wastewater is land-applied to fields under the operational control of Doornenbal Dairy.

No 10. Identify specific records that will be maintained to document the implementation and management of the minimum NMP elements (#2-#9 above). [40 CFR 122.42(e)(1)(ix)]
The NMP does not identify the site-specific records that will be maintained to document the NMP elements listed above.

Additional NMP Requirements for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs

N/A 11. Application rates are calculated as required by 40 CFR 412.4(c)(2).
No manure or wastewater is land-applied to fields under the operational control of Doornenbal Dairy.

N/A 12. Specifies the manure, process wastewater, and soil sampling at the required frequencies and for the required parameters? [40 CFR 412.4(c)(3)] *(manure/wastewater annually for P & N, soils at least every 5 years for phosphorus transport)*
No manure or wastewater is land-applied to fields under the operational control of Doornenbal Dairy.

N/A 13. Includes periodic inspection of land application equipment? [40 CFR 412.4(c)(4)]
No manure or wastewater is land-applied to fields under the operational control of Doornenbal Dairy.

Nutrient Management Plan (NMP) (continued)

N/A 14. Includes 100-foot setback or 35-foot vegetated buffer, or approved alternative? [40 CFR 412.4(c)(5)]
No manure or wastewater is land-applied to fields under the operational control of Doornenbal Dairy.

Where applicable, identify each field and setback type:

Field ID	Setback Type
N/A	N/A

Monitoring, Documentation and Recordkeeping

Does the facility maintain the following records?

N/A 15. The completed permit application? [40 CFR 412.37(b)]
Doornenbal Dairy is an unpermitted CAFO.

No 16. The current design of manure storage structures, including volume of solids accumulation, design treatment volume, total design volume, and approximate number of days of storage capacity? [40 CFR 412.37(b)(5)]
The facility's NMP identifies individual storage structures and capacities but does not include all of the elements listed above. In addition, it was not clear whether the calculated storage capacity in the NMP was correct, based on the discrepancy between the approved plan and the plan that was reviewed (see question 2). This documentation is not required for unpermitted CAFOs under the Clean Water Act.

No 17. The date, time, and estimated volume of any overflow? [40 CFR 412.37(b)(6)]
According to Mr. Doornenbal, an estimated 1,000 gallons of manure slurry overflowed from the dairy's Concrete West Slurry Pit into the adjacent field approximately two weeks before the inspection. The inspectors observed evidence of the overflow (Photograph 2). Mr. Doornenbal did not document the date, time, and estimated volume of the overflow. This documentation is not required for unpermitted CAFOs under the Clean Water Act. Note, however, that any overflow resulting in a discharge to Waters of the U.S. from an unpermitted CAFO is a violation of the Clean Water Act. Mr. Doornenbal also did not report the unauthorized release to ISDA, as required by ISDA's Rules Governing Dairy Byproduct.

No 18. Manure and process wastewater transfers, including the most current nutrient analysis of the manure or wastewater that was provided to the recipient, the date and approximate amount transferred, and the name and address of the recipient? [40 CFR 122.42(e)(3)]

Yes a. Name of recipient

No b. Address of recipient

Yes c. Date of transfer

No d. Approximate amount transferred (tons/gallons)

Monitoring, Documentation and Recordkeeping (continued)

No — e. Recent (12 months or less) manure nutrient analysis provided

All manure and wastewater generated at Doornenbal Dairy are transferred off-site for use by third parties, including on land owned by Doornenbal Dairy but leased to third party farmers. Mr. Doornenbal stated that the manure hauler maintains copies of invoices that document the number of loads and destination for solid manure transfers. Wastewater is transferred via piping to the sprinklers used to irrigated adjacent fields. These fields are leased to third-party operators and Mr. Doornenbal confirmed that all land application decisions (timing, rate, amount, etc.) are made by the third-party operator. This documentation is not required for unpermitted CAFOs under the Clean Water Act.

Additional Production Area Records for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs

No — 19. Documentation of daily and weekly visual inspections of the production area, including:

No — a. Weekly inspection of stormwater diversions, waste storage structures, and process wastewater channeling devices? [40 CFR 412.37(b)(1)]

No — b. Daily inspection of water lines? [40 CFR 412.37(b)(1)]

No — c. Weekly inspection of impoundments and tanks? [40 CFR 412.37(b)(1)]

The facility representative indicated that the above items are inspected during daily activities around the production area; however, the visual inspections are not documented. This documentation is not required for unpermitted CAFOs under the Clean Water Act.

No — 20. Weekly records of the depth of manure and process wastewater in liquid impoundments and terminal tanks? [40 CFR 412.37(b)(2)]
The facility representative indicated that lagoon wastewater levels are evaluated during daily operations in the production area. The lagoons do not include depth markers and the facility representative does not document freeboard or any other indicator of wastewater levels in the impoundments. This documentation is not required for unpermitted CAFOs under the Clean Water Act.

No — 21. Documentation of actions taken to correct deficiencies found as a result of production area inspections? [40 CFR 412.37(b)(3)]
This documentation is not required for unpermitted CAFOs under the Clean Water Act.

Yes — 22. Documentation of mortalities management? [40 CFR 412.37(b)(4)]
Mortalities are picked up by Darling International for rendering. The facility maintains hauling invoices that document the number of animals picked up and the dates. This documentation is not required for unpermitted CAFOs under the Clean Water Act.

Monitoring, Documentation and Recordkeeping (continued)

Land Application Area Records for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs

The following records (questions 26 – 33) do not apply to Doornenbal Dairy, as no manure or wastewater is land-applied to fields under the dairy's operational control.

N/A 23. Expected crop yields? [40 CFR 412.37(c)(1)]

N/A 24. Date(s) manure or process wastewater is applied to each land application site? [40 CFR 412.37(c)(2)

N/A 25. Weather conditions at the time of, and for 24 hours prior to and following, land application? [40 CFR 412.37(c)(3)]

N/A 26. Test methods used to sample and analyze manure, process wastewater, and soil? [40 CFR 412.37(c)(4)]

N/A 27. Results from manure, process wastewater, and soil analyses? [40 CFR 412.37(c)(5)]

N/A 28. Manure and process wastewater application rates determined in accordance with the technical standards? [40 CFR 412.37(c)(6)]

N/A 29. Calculations showing the total N and P to be applied to each land application site, including sources other than manure or process wastewater? [40 CFR 412.37(c)(7)]

N/A 30. Total amount of N and P actually applied to each land application site, including calculations? [40 CFR 412.37(c)(8)]

N/A 31. Method used to apply manure and process wastewater? [40 CFR 412.37(c)(9)]

N/A 32. Date(s) of manure application equipment inspections for leaks? [40 CFR 412.37(c)(10)]

N/A 33. Describe the records that are maintained to document implementation of the following nutrient management planning elements [40 CFR 122.23(e)]:
   a. Identify site-specific conservation practices to control runoff of pollutants.
   b. Identify protocols for manure, process wastewater, and soil sampling and testing.
   c. Establish protocols to land apply manure or process wastewater in accordance with site-specific nutrient management practices that ensure appropriate agricultural utilization of the nutrients in the manure, litter, or process wastewater.

Land Application Sites

No 34. Does the facility apply manure or wastewater to land owned by or under the operational control of the CAFO?

- Number of land application sites: N/A
- Irrigation type(s): N/A
- Furrow/flood irrigation sites – what is fate of applied wastewater and tailwater? N/A

Production Area

35. List impoundments

Impoundment ID	Wastewater Type	Wastewater Source(s)	Pumping level[2]	Wastewater below pumping level?	Max. recorded level	Date of max. recorded level
Earth Separator	☒ process generated ☐ runoff	Milking parlors	N/A	N/A	N/A	N/A
East Liquid Lagoon	☒ process generated ☒ runoff	Earth Separator, southeast pens, feed and commodities storage, Runoff Pond	N/A – not required for unpermitted CAFOs under the Clean Water Act	N/A Freeboard during inspection approx. 3 ft.	N/A	N/A
Runoff Pond	☐ process generated ☒ runoff	Northeast pens		N/A Freeboard during inspection >2 ft.	N/A	N/A
Concrete East Slurry Pit	☒ process generated ☐ runoff	East freestall barn		N/A Freeboard during inspection >2 ft.	N/A	N/A
North Slurry Lagoon	☒ process generated ☒ runoff	Central concrete feed alleys		N/A Freeboard during inspection >2 ft.	N/A	N/A
Northwest Evaporation Pond	☒ process generated ☒ runoff	East Liquid Lagoon, west slurry drying area, and northwest pens		N/A Freeboard during inspection approx. 2 in.	N/A	N/A

[2] The pumping level represents the minimum capacity necessary to contain runoff and direct precipitation from the 25-year, 24-hour rainfall event (40 CFR 40 CFR 412.37(a)(2)).

Production Area (continued)						
Impoundment ID	**Wastewater Type**	**Wastewater Source(s)**	**Pumping level[3]**	**Wastewater below pumping level?**	**Max. recorded level**	**Date of max. recorded level**
Concrete West Slurry Pit	☒ process generated ☐ runoff	West freestall barn	N/A – not required for unpermitted CAFOs under the Clean Water Act	N/A Freeboard during inspection >2 ft.	N/A	N/A
Southwest Evaporation Pond	☒ process generated ☒ runoff	East Liquid Lagoon and southwest pens		N/A Freeboard during inspection approx. 1 ft.	N/A	N/A

36. Impoundment(s) collect all runoff from:

Yes Animal confinement areas?[4]
Runoff from all pens flows to an adjacent pond, as described in the Production Area comments below. Note, however, that runoff from the southeast pens and feed storage areas flows to a ponding area before being pumped to the East Liquid Lagoon.

Yes Manure storage areas?[5]
Manure is stockpiled in the pens. Runoff from the slurry drying area east of the North Slurry Lagoon is contained within embankments around the drying area. Runoff from the slurry drying area west of the North Slurry Lagoon flows to the Northwest Evaporation Pond. Note, however, that runoff from the southeast pens flows to a ponding area before being pumped to the East Liquid Lagoon.

[3] The pumping level represents the minimum capacity necessary to contain runoff and direct precipitation from the 25-year, 24-hour rainfall event (40 CFR 40 CFR 412.37(a)(2)).

[4] Animal confinement area includes but is not limited to open lots, housed lots, feedlots, confinement houses, stall barns, free stall barns, milkrooms, milking centers, cowyards, barnyards, medication pens, walkers, animal walkways, and stables (40 CFR 40 CFR 122.23(b)(8)).

[5] Manure storage area includes but is not limited to lagoons, runoff ponds, storage sheds, stockpiles, under house or pit storages, liquid impoundments, static piles, and composting piles (40 CFR 40 CFR 122.23(b)(8)).

Production Area (continued)

No Raw material storage areas?[6]

Runoff from the feed storage areas flows to a ponding area before being pumped to the East Liquid Lagoon. In addition, waste silage was observed along the east facility boundary at the top of a slope that drains to the borrow ditch along Emmett Road. Corn stalk fragments were observed in the borrow ditch at the southeast corner of the facility, at the northwest corner of the intersection of Emmett Road and Galloway Road, near a culvert that directs stormwater to the east, under Emmett road. Based on evaluation of aerial and site imagery (Google Earth, Google Street View, and Idaho DEQ Final 2014 §305(b) Integrated Report interactive mapping tool), it appears that the stormwater flow path from the facility is to the east, approximately 200 feet, then south, under Galloway Road. From the culvert under Galloway Road, the flow path appears to extend south approximately 1/3 of a mile. It is not clear whether the flow terminates at that point (in an agricultural field) or continues south approximately another 1/3 mile to enter East Hartley Gulch, which drains to the Boise River.

Yes Waste containment areas?[7]

Runoff from the southeast pens and feed storage areas flows to a ponding area before being pumped to the East Liquid Lagoon.

N/A Egg washing or egg processing facility?

Yes Mortality storage, handling, treatment or disposal area?

N/A Other? (describe): N/A

No 37. Was manure or wastewater observed in a waterway? If yes, describe:

The inspectors observed evidence of runoff from the silage storage area to the borrow ditch along Emmett Road (see details under Question 36, raw materials storage areas). The inspectors were unable to establish a connection to Waters of the U.S. from the borrow ditch.

No 38. Adequate storage available for manure, litter, and process wastewater, and procedures are in place to ensure proper operation and maintenance of the storage facilities? [40 CFR 122.42(e)(1)(i)]

Although the facility's NMP indicated a surplus of storage capacity to contain manure and process wastewater, site observations indicated inadequate capacity. The Northwest Evaporation Pond had minimal freeboard (Photograph 1) and there had been a recent overflow from the Concrete West Slurry Pit. According to Mr. Doornenbal and based on site observation, the spill did not reach the end of the field (Photograph 2).

[6] Raw materials storage area includes but is not limited to feed silos, silage bunkers, and bedding materials (40 CFR 40 CFR 122.23(b)(8)).

[7] The waste containment area includes but is not limited to settling basins, and areas within berms and diversions which separate uncontaminated storm water (40 CFR 40 CFR 122.23(b)(8)).

Production Area (continued)

Yes 39. Confined animals do not have direct contact with waters of the United States? [40 CFR 122.42(e)(1)(iv)]
Waters of the U.S. do not flow through the animal confinement areas.

N/A 40. Clean water is diverted from the production area? [40 CFR 122.42(e)(1)(iii)]
Based on information provided by the facility representative and site observations, localized topography generally would prevent run-on to the production area. It is recommended that Mr. Doornenbal evaluate, and mitigate if necessary, the potential for run-on to enter the site from Emmett Road.

Yes 41. Chemicals and other contaminants handled on-site are not disposed of in any manure, litter, process wastewater, or storm water storage or treatment system? [40 CFR 122.42(e)(1)(v)]
The facility representative stated that all chemicals necessary for use in the operation are fully used, creating no waste chemicals for disposal, and empty chemical containers are returned to the supplier. The inspectors did not evaluate the chemical storage location but did not identify evidence of improper chemical disposal.

Additional Production Area Requirements for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs (Subparts C and D)

No 42. All open surface impoundments and terminal storage tanks have depth markers which clearly indicate the minimum capacity necessary to contain the runoff and direct precipitation of the 25-year, 24-hour rainfall event? [40 CFR 412.37(a)(2)]
Depth markers are not required for unpermitted CAFOs under the Clean Water Act.

Yes 43. Mortalities remain in the production area until disposal, are not disposed in liquid manure or process wastewater treatment systems, and are handled to prevent discharge of pollutants to surface waters? [40 CFR 412.37(a)(4)]
Mortalities are stored temporarily on site prior to pick up by the renderer. The mortality storage location is between the Concrete West Slurry Lagoon and the Southwest Evaporation Pond; runoff from this area drains to the Southwest Evaporation Pond.

Production Area (continued)

Production area comments:

Wastewater from the milking parlor flows to the Earth Separator for settling. Wastewater overflows from the separator to the East Liquid Lagoon. Wastewater is pumped from the East Liquid Lagoon for irrigation.

Runoff from the northern portion of the southeast pens flows directly to the East Liquid Lagoon. Runoff from the southern portion of the southeast pens and the adjacent silage and commodities storage area flows east to a ponding area located south of the East Liquid Lagoon along Emmett Road. Wastewater is pumped from the ponding area to the East Liquid Lagoon. The ponding area contained wastewater at the time of the inspection and it appeared that if wastewater were to overflow this area, it would flow to the borrow ditch along Emmett Road. According to the facility representative and ISDA, this area cannot be established and maintained as a formal impoundment because it does not meet the setback requirements in ISDA's Rules Governing the Stockpiling of Agricultural Waste. The inspectors recommended that the facility operator establish procedures to ensure that wastewater does not pond in this area (e.g., through site grading or installation of automatic pumps).

Runoff from the northeast pens flows to the Northeast Runoff Pond. Wastewater can be pumped from the Northeast Runoff Pond to the East Liquid Lagoon.

Runoff from the northwest pens and the slurry drying area west of the North Slurry Lagoon flows to the Northwest Evaporation Pond. Runoff from the southwest pens and the mortality storage area flows to the Southwest Evaporation Pond.

Manure slurry is scraped from the east and west freestall barns to the Concrete East Slurry Pit and Concrete West Slurry Pit, respectively. Slurry is removed directly from the slurry pits for hauling offsite. Manure slurry is scraped from the concrete aprons along the central feed lanes to the North Slurry Lagoon. Slurry from the North Slurry Lagoon is spread on two adjacent areas for drying and subsequent hauling offsite.

During the site tour, the inspectors observed a small quantity of spilled slurry on the facility lane that accesses the Concrete West Slurry Pit; it appeared that runoff from this area would flow into the adjacent field. According to the facility representative, when slurry was pumped out of the Concrete West Slurry Pit to stop the overflow, the truck driver may have emptied the hose onto the ground instead of back into the slurry pit. It is recommended that the facility representative educate the truck drivers on appropriate procedures when pumping wastewater from its impoundments to prevent discharging wastewater offsite

Inspector: Jennifer Fernando **Date:** 5/30/2019

Idaho CAFO Inspection – Photograph Log: P&L Doornenbal Dairy

Photograph 1. Minimal freeboard was observed at the northwest corner of the Northwest Evaporation Pond. View looking southwest from the northwest corner of the Northwest Evaporation Pond.

Photograph 2. The inspectors observed evidence of an overflow from the Concrete West Slurry Pit. View looking southwest from the northwest corner of the Concrete West Slurry Pit.

Aerial Photo/Site Map